



John R. Kasich, Governor
Mary Taylor, Lt. Governor
Craig W. Butler, Director

January 13, 2017

Jeffrey McCombs
Air Permitting
TransCanada/Columbia Pipeline
Group
455 Race Track Rd.
Washington, PA 15301

**Re: Pennant Midstream LLC-Hickory Bend Gas
Processing Plant
Resolution of Violation (ROV) and Notice of
Violation Rescission
Air Permit
Mahoning County
0250002026**

Division of Air Pollution Control

Dear Mr. McCombs:

Thank you for your May 25, 2016, July 26, 2016, and January 12, 2017, responses to Ohio EPA's April 28, 2016, Notice of Violation (NOV) letter, and the September 13, 2016, response to Ohio EPA's July 22, 2016, NOV letter. Your responses included a timeline for a permit modification application and documentation that a valve port for oil samples was installed.

Ohio EPA has reviewed the documentation that you provided and has determined that Pennant has now resolved all the violations noted in the July 22, 2016, NOV. Due to new information provided in the July 26, 2016, letter and the January 12, 2017, email, and the permit modification application received August 8, 2016, the April 28, 2016, NOV will be rescinded. To ensure that all the violations have been addressed, Ohio EPA has included Pennant's response for each violation and its status.

Rescission of Violation

Letter Citation: Finding 1

Rule Citation: The terms and conditions of permit-to-install and operate (PTIO) P0117085 issued July 21, 2014, and Ohio Revised Code (ORC) 3704.05(C). Per the electronic copy of the 2015 Permit Evaluation Report (PER) received on February 9, 2016, there was an exceedance of the emission limit for pigging activities (P003). The PER indicated that fugitive VOC emissions from P003 were above the limit from June 2015 until February 2016, for a total of 9 months. The exceedances ranged from 0.246 ton per month (June and July 2015) to 0.335 ton per month (December 2015).

In the letter received July 26, 2016, Pennant described a revised pigging liquids and pig removal process that had been in use since November 2014. Using this method, the fugitive emissions were reduced due to additional venting to the flare, therefore, the 2015 fugitive VOC emissions from P003 were below the emission limit in the PTIO, and the emissions violations did not occur. Calculations provided in an email on January 12, 2017, also documented that the emissions at P001, the controlled maintenance blowdowns

JEFFREY MCCOMBS
JANUARY 13, 2017
PAGE 2

vented to the flare, were not above the permit limits as a result of the additional flaring. This NOV will be rescinded.

Resolution of Violation

Letter Citation: Finding 1


Rule Citation: The terms and conditions of PTIO P0119393 issued October 7, 2015, ORC 3704.05(C), and 40 CFR Part 60, Subpart OOOO for P001: No visible particulate emissions from the flare, except for periods not to exceed a total of 5 minutes during any 2 consecutive hours. A representative from our office documented 10 minutes of visible smoke from the flare on July 13, 2016.

The documentation that Pennant submitted on September 13, 2016, included a picture of a valve port that was installed to prevent future transformer and flare blower outages. By installing the valve port, the transformer and flare blower will no longer need to be shut off to collect transformer oil samples, and the flare smoking from that activity will be eliminated. This violation is considered resolved.

Please note that this does not preclude the Director from seeking administrative or civil penalties pursuant to Ohio Revised Code section ORC Section 3704.06 for the violation(s) noted in the NOV letters. The decision on whether to pursue or decline to pursue such penalties regarding these violations is dependent on several factors, one of which is the company's future compliance with Ohio EPA regulatory requirements.

Thank you for your time and cooperation and if you have any questions, please do not hesitate to contact me by phone at (330) 963-1261 or by email at Jana.Gannon@epa.ohio.gov.

Sincerely,



Jana L. Gannon
Environmental Specialist
Division of Air Pollution Control
Northeast District Office

JLG:bo

cc: John Paulian/James Kavalec, DAPC/CO
Tim Fischer, Supervisor, DAPC/NEDO
Brian Dickens, U.S. EPA Region V